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15 (*Additional Counsel Listed on Signature Page*)

16 Attorneys for all Plaintiffs, individually and on
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18 **UNITED STATES DISTRICT COURT**

19 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

20 AARON SENNE, et al., Individually and on
21 Behalf of All Those Similarly Situated,

22 Plaintiffs,

23 vs.

24 OFFICE OF THE COMMISSIONER OF
25 BASEBALL, an unincorporated association
doing business as MAJOR LEAGUE
BASEBALL; et al.;

26 Defendants.

CASE NO. 3:14-cv-00608-RS-EDL

CLASS ACTION

**STIPULATED REQUEST AND
[PROPOSED] ORDER CHANGING
TIME PER LOCAL RULE 6-2 FOR
HEARING PLAINTIFFS' MOTION TO
COMPEL**

1 IT IS HEREBY STIPULATED between Plaintiffs and Defendants, by and through their
2 respective counsel (collectively, the “Parties”), pursuant to Local Rule 6-2, as follows:

3 WHEREAS, Defendants filed motions to dismiss for lack of personal jurisdiction (Dkt. Nos.
4 115, 129) and to transfer venue (Dkt. No. 118) (“Defendants’ Pending Motions”);

5 WHEREAS, Plaintiffs sought discovery in order to respond to Defendants’ Pending Motions;

6 WHEREAS, On June 27, 2014, the Court stated that the subject matter of Plaintiffs’ request
7 was “*in general* appropriate,” and ordered the parties to continue to meet and confer over the scope of
8 that jurisdictional and venue discovery (Dkt. No. 144);

9 WHEREAS, Plaintiffs formally served jurisdictional and venue discovery to Defendants on
10 July 9, 2014, and Defendants provided objections and responses on August 8;

11 WHEREAS, pursuant to the parties’ stipulation (Dkt. 183), jurisdictional and venue discovery
12 is currently scheduled to close on September 26, 2014, and, under the current stipulated briefing
13 schedule for Defendants’ Pending Motions, (Dkt. 183), Plaintiffs must file their oppositions to
14 Defendants’ motions by October 10, 2014 and Defendants must file their replies by November 14,
15 2014;

16 WHEREAS, a discovery dispute remains, so concurrent with this Stipulation to Shorten Time,
17 Plaintiffs are seeking to compel responses to their jurisdictional and venue discovery requests
18 (“Plaintiffs’ Motion to Compel”);

19 WHEREAS, all parties seek to resolve Plaintiffs’ Motion to Compel in an expedited manner
20 so that the briefing schedule for Defendants’ Pending Motions will be disrupted as minimally as
21 possible and the Court can adjudicate Defendants’ Pending Motions quickly;

22 WHEREAS, pursuant to a stipulation, the Court previously ordered a time modification on
23 April 10, 2014 that extended the time for Defendants to respond to the First Amended complaint and
24 also moved the Initial Case Management Conference to a later date (Dkt. 33); pursuant to an
25 additional stipulation, Plaintiffs filed a motion for leave to file a Second Amended Complaint, which
26 Defendants did not oppose, and on May 12, 2014 the Court extended the time for certain Defendants
27 to respond to the Second Amended Complaint and further ordered that Plaintiffs would have until
28 July 11, 2014 to oppose any pre-answer motions (Dkt. 53); on May 21, 2014, the Court ordered, again

1 pursuant to a stipulation, a modified response date for the Baltimore Orioles, Inc. and Baltimore
 2 Orioles, L.P. (Dkt. 63); pursuant to another stipulation, the parties also stipulated to a new briefing
 3 schedule for Defendants' Pending Motions to account for jurisdictional and venue discovery (Dkt.
 4 183);

5 NOW THEREFORE, it is hereby stipulated and agreed by all parties' counsel in this action
 6 that the hearing date for Plaintiffs' Motion to Compel should be shortened to September 23, 2014, or
 7 as soon thereafter as is practicable for the Court;

8 FURTHER, the parties stipulate and agree that Plaintiffs will file a Motion to Compel by
 9 September 3, 2014; Defendants will file any opposition to Plaintiffs' Motion to Compel by September
 10 12, 2014, and Plaintiffs will file any reply to Plaintiffs' Motion to Compel by September 16, 2014;

11 FURTHER, in the event that the Court grants Plaintiffs' Motion to Compel in whole or in
 12 part, the parties stipulate and agree that Plaintiffs will be granted a short extension on the date for
 13 filing an opposition to Defendants' Pending Motions, and the parties will promptly meet and confer
 14 in an attempt to stipulate to a new briefing schedule for Defendants' Pending Motions, provided,
 15 however, that Defendants shall have at least as much time to submit a reply as contemplated in the
 16 briefing schedule currently in effect (Dkt. 183).

17
 18 Dated: September 3, 2014

Respectfully submitted,

19
 20 /s/ Garrett R. Broshuis

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and Baltimore Orioles, L.P.)*

Filer's Attestation

I, Garrett R. Broshuis, am the ECF user whose identification and password are being used to file this Stipulated Request and [Proposed] Order Changing Time Per Local Rule 6-2. In compliance with Local Rule 5-1(i)(3), I hereby attest that the counsel listed above concur in this filing. I will maintain an executed copy of this stipulation in our files that can be made available for inspection upon request.

Dated: September 3, 2014

/s/ Garrett R. Broshuis

Garrett R. Broshuis

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[PROPOSED] ORDER

The Court, having considered the papers and pleadings on file, and cause appearing,
PURSUANT TO STIPULATION:

HEREBY GRANTS the Parties' Stipulation.

IT IS ORDERED that the hearing date for Plaintiffs' Motion to Compel will be
September 23, 2014 at 9:00 a.m. or as soon thereafter as is practicable for the Court;

IT IS FURTHER ORDERED that Plaintiffs will file a Motion to Compel by September
3, 2014; Defendants will have until September 12, 2014 to file any opposition to Plaintiffs' Motion
to Compel, and Plaintiffs will have until September 16, 2014 to file any reply to the Motion to
Compel.

DATED:

HON. ELIZABETH D. LAPORTE